



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

141690

June 29, 1998

Timothy A. Bent, CPG
Senior Environmental Project Manager
Bridgestone/Firestone, Inc.
50 Century Boulevard
Nashville, TN 37214

**RE: Approval of May 13, 1998 Well Abandonment Plan;
Conditional Approval of May 21, 1998 Long-Term Groundwater Monitoring Plan;
Woodlawn landfill Site**

Dear Mr. Bent:

EPA and the State have reviewed the two documents referenced above. This letter is to notify you that EPA approves of the May 13, 1998 Well Abandonment Plan (with the inclusion of the wells identified in the final paragraph, below, if appropriate) and conditionally approves of the May 21, 1998 Long-Term Groundwater Monitoring Plan. Conditions for approval of the Long-Term Groundwater Monitoring Plan follow:

- ▶ Well B-6 will be included as an area-of-attainment compliance well. Vinyl chloride was detected in samples from the well at concentrations above the cleanup level during the last two sampling events (August and November 1997).
- ▶ Data obtained from monitoring wells MW-110A, MW-110B and/or MW-111B will be included in the statistical evaluation of the attainment of cleanup standards if the level of any site-related contaminant in any sample from the well(s) exceeds the cleanup standard.
- ▶ Attainment of cleanup standards will be assessed in wells individually unless justification is provided to, and approved by, EPA for pooling data from multiple wells. Data from wells in a common hydrochemical setting may be grouped in order to evaluate attainment. Data obtained for wells in a unique hydrochemical setting should be evaluated separately. In addition, when pooling data, care must be exercised in order to ensure that nonattainment areas or "hot spots" are not masked by data from surrounding "clean" areas.

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- The method detection limit (MDL) will be used in the statistical analysis of attainment for all results reported as below the MDL, regardless of the percentage of samples from a well in which an analyte was not detected.

Please provide EPA and the State with a revised long-term monitoring plan which addresses the conditions specified above within two weeks of your receipt of this letter. In addition, please 1) identify well ITB-3 as an area-of-attainment compliance well in Table 1 and Figure 1 of the plan, and 2) explain in the plan the intended future use of monitoring wells B-2, B-5, ITP-2, MW-101A and MW-101B. These wells are not included in the long-term monitoring program and should be abandoned if they will not be used in the future.

Sincerely



Debra Rossi
Remedial Project Manager
General Remedial Section

cc: James Gravette, MDE
Joseph Lewandowski, ERM
Tina Stack, ARCADIS Geraghty & Miller

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